

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION  
THIS DOCUMENT RELATES TO:

*All Actions*

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

**JOINT STIPULATION AND [PROPOSED]  
ORDER RE REPLACEMENT EXHIBITS  
TO PLAINTIFFS' CORRECTED  
OMNIBUS OPPOSITION TO  
DEFENDANTS' MOTIONS FOR  
SUMMARY JUDGMENT (ECF NO. 2413)**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

1           WHEREAS, the Court ordered the parties to meet and confer regarding the filing of excerpted  
 2 versions of the exhibits, *see* ECF No. 2484 at 2;

3           WHEREAS, the Court issued an order instructing Plaintiffs “to refile the reduced set of  
 4 exhibits,” and directing the parties to “meet and confer and file a stipulation regarding briefing deadlines  
 5 for a motion to seal the re-filed exhibits,” *see* ECF No. 2549 at 1;

6           WHEREAS, on December 17, 2025, Plaintiffs re-filed replacement exhibits and an  
 7 accompanying declaration;

8           WHEREAS, the parties have met and conferred regarding the page limits and deadlines that will  
 9 apply to Defendants’ motions to seal the replacement exhibits, as well as Plaintiffs’ oppositions and  
 10 Defendants’ replies thereto;

11          THEREFORE, pursuant to Civil L.R. 7-12 and the Court’s Case Management Order (ECF No.  
 12 2484), the Court hereby directs the Clerk to lock the following docket entries containing the originally  
 13 filed exhibits and supporting administrative motion to seal, declarations, and sealing charts:

- 14           •        ECF No. 2356 (Administrative Motion to File Under Seal)
- 15           •        ECF No. 2357 (Declaration of Previn Warren)
- 16           •        ECF No. 2403 (Sealing Chart)
- 17           •        ECF No. 2358 (Exhibits 1-20)
- 18           •        ECF Nos. 2361 – 2365 (Exhibits 21-130)
- 19           •        ECF No. 2367 (Exhibits 131-170)
- 20           •        ECF Nos. 2370 – 2372 (Exhibits 171-300)
- 21           •        ECF Nos. 2374 – 2381 (Exhibits 301-700)
- 22           •        ECF No. 2383 (Exhibits 701-750)
- 23           •        ECF Nos. 2386 – 2388 (Exhibits 750-825)
- 24           •        ECF Nos. 2390 – 2391 (Exhibits 826-900)
- 25           •        ECF Nos. 2393 – 2394 (Exhibits 901-1000)
- 26           •        ECF Nos. 2396 - 2399 (Exhibits 1001-1185)
- 27           •        ECF No. 2414-2 (Corrected Declaration of Previn Warren)
- 28           •        ECF No. 2414-3 (Corrected Sealing Chart)
- 29           •        ECF Nos. 2414-4 - 2414-9 (Corrected Exhibits 6, 567, 1117, 1180; Exhibits 1186-1187)

30          The Court further sets the following, jointly stipulated schedule for conferrals and briefing  
 31 related to the sealing of the replacement exhibits:

- 32           •        January 16: Defendants will provide to Plaintiffs redacted versions of the excerpted exhibits,  
 33 with an index (listing the pages that contain the redactions) that is organized by category.
- 34           Defendants’ proposed redactions will adhere to any rulings issued by the Court in the interim

1                   regarding sealing.

- 2
- 3     • January 19: Plaintiffs will file the redacted versions of the excerpted exhibits. Defendants and
  - 4       Plaintiffs will meet and confer to discuss Defendants' proposed redactions. At this meet and
  - 5       confer, Plaintiffs will tell Defendants their position on each redaction category. Plaintiffs are not
  - 6       required to send Defendants a response to each specific redaction.
  - 7     • January 26: Defendants file omnibus sealing motions, no longer than 10 pages each, and the
  - 8       parties file an omnibus sealing stipulation.
  - 9     • February 3: Plaintiffs file oppositions, no longer than 10 pages each, to Defendants' omnibus
  - 10      sealing motions.
  - 11     • February 8: Defendants file replies, no longer than 5 pages each, in support of omnibus sealing
  - 12      motions.

13                  The above deadlines supersede the deadlines concerning the sealing of these exhibits set forth at ECF  
14                  No. 2451 at 2.

15                  IT IS SO ORDERED

16

17                  Dated: December \_\_\_, 2025

18                  HONORABLE YVONNE GONZALEZ ROGERS  
19                  United States District Court

20                  **IT IS SO STIPULATED AND AGREED**

21                  Respectfully submitted,

22                  DATED: December 19, 2025

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## **ATTESTATION**

I, Joseph Sandoval-Bushur, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: December 19, 2025

By: s/ Joseph Sandoval-Bushur